

UNITED STATES DISTRICT COURT

for the

WESTERN DISTRICT OF TEXAS

Filed

5-20-14
Clerk, U. S. District Court
Western District of Texas

By

Deputy

United States of America

v.

Michael Anthony Keich

Case No. 5:14-MJ-549

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 20, 2014 in the county of Bexar in the
Western District of Texas, the defendant(s) violated:

Code Section

Offense Description

26 USC § 5861 and

Manufacture or Possession of an Unregistered NFA Weapon
(Max Pen: 10 yr. imprisonment; \$10,000 fine; 3 yrs sup release +)

18 USC § 842(a)

Manufacture of an Explosive Without a License
(Max Pen: 10 yr. imprisonment; \$250,000 fine; 3 yrs sup release +)

(+ \$100 Special Assessment)

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Complainant's signature

Edward Doyle, S/A, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/20/2014

Judge's signature

City and state: San Antonio, Texas

HENRY J. BEMPORAD, US MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT

I, Special Agent Edward Doyle, with the Federal Bureau of Investigation, hereby state that I have been an agent for one and a half years, and am currently assigned to the San Antonio Division, Del Rio Residence Agency. I have experience in the conduct of such investigations through formal training and on the job training. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

This affidavit is in support of a criminal complaint charging Michael Keich with a violation of Title 26 USC § 5861(d) Manufacture or Possession and an Unregistered NFA Weapon and a violation of Title 18 USC § 842(a) Manufacture of an Explosive Without a License. It is unlawful 26 § 5861(d) to manufacture or possess an unregistered weapon, which would include an explosive device, without a license. Likewise, 18 USC § 842(a) prohibits the manufacture an explosive device without a license

Based upon the information summarized in this application, I have reason to believe Michael Keich has committed the above-mentioned crimes.

I have personally participated in the investigation of the offenses alleged in this affidavit, along with co-case agents, and am thoroughly familiar with the information contained in this affidavit either through personal investigation, knowledge and observations made by me during the course of the investigation, review of records obtained during the investigation, and information and documents conveyed by other law enforcement officials, third party record keepers, and other sources. This affidavit contains information necessary to support probable

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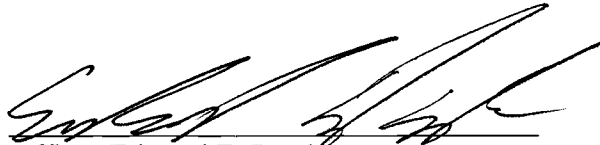
cause for issuance of this complaint. The affidavit does not include every fact and matter observed by me or known to the government.


Probable Cause

1. On May 2, 2014, a cooperating defendant (CD) identified Michael Keich as a maker of explosive devices, specifically pipe bombs, in the D'Hanis, Texas, area. The CD stated that he had purchased pipe bombs that he was arrested for being in possession of, from Keich, and received materials and instructions on how to make a bomb from Keich.
2. During a post arrest interview, the CD admitted to possessing three (3) suspected destructive devices that he obtained from a person named "Mike Keich" from D'Hanis, Texas, approximately three (3) months ago, particularly described as white plastic PVC pipe with end caps attached with black tape and clear glue and an attached fuse at one end of the device. The CD stated he shook one of the devices and that it sounded as if it was filled with sand. He also stated he had one of the devices in his garage at his residence, 1209 Shady Lane, Hondo, Texas. The CD admitted to having black powder in the residence but that he used it for ammunition reloading. On this same date, a device matching the description provided The CD was located in the garage of his residence. The CD was not able to account for two (2) of the three (3) devices.
3. On May 17-18, 2014, a Cooperating Witness (CW), who is an associate of Keich, advised Agents that Keich had in his possession the components to build a pipe bomb. The CW observed gun powder, fuses, shotgun shells, and BBs. Keich identified the materials to the CW as materials that would be used to build a pipe bomb.

4. On May 16, 2014, Keich told the CW in a recorded audio conversation that the only components that he needed in order to complete a pipe bomb were "PVC pipe and bullets."
5. On May 16, 2014 in a recorded conversation at a later time, Keich told the CW that he built two bombs for another individual and that Keich had offered the bombs to that individual at a price of \$150.00 for a small bomb, \$200.00 for a medium sized bomb, and \$300.00 for a large bomb. When the CW asked if Keich could have some bombs made by the next weekend, Keich told the CHS that he needed some gunpowder and fuses.
6. On May 20, 2014, at approximately 6:30 a.m. a Federal search warrant was conducted at the residence of Keich. An explosive device described as a "pipe bomb" by an FBI Special Agent Bomb Technician and Bureau of Alcohol, Tobacco and Firearms agents was recovered from the residence of Keich.
7. On May 20, 2014 at approximately 9:00 a.m. Federal Bureau of Investigation (FBI) Special Agent Bomb Technicians (SABT) and the San Antonio Police Department Bomb Squad rendered the suspected device safe outside the residence.
8. On May 20, 2014, Keich was read his Miranda warnings, and wished to speak with interviewing agents. Keich stated that he had constructed three pipe bombs in the past by using PVC pipe, gun powder, BBs, and fire cracker fuse. He built the pipe bombs to blow up an old car that is on a friend's property. Keich believed that some of the equipment used to construct the previous three pipe bombs was still at his house.
9. Keich stated that he was aware that it was illegal to construct pipe bombs.

10. During the same post arrest interview Keich said that he was approached by an individual that wanted to buy pipe bombs from him. Keich told that person that he would build that person pipe bombs, but first needed money to get the supplies to build them.
11. A database query by the Bureau of Alcohol Tobacco and Firearms shows ~~Winkler~~ ^{Keich Galt} is not licensed or registered to possess destructive devices.
12. Your Affiant believes and respectfully submits that there is probable cause for a violation of Title 26 USC 5861(d), Manufacture or Possession of an Unregistered NFA Weapon and of Title 18 USC 842(a), Manufacture of an Explosive Without a License.


Affiant Edward F. Doyle
Special Agent, FBI


HENRY J. BEMPORAD
United States Magistrate Judge